

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

DECKERS OUTDOOR
CORPORATION,

Plaintiff,

v.

Trends SNJ, Inc.; FOREVER LINK
INTERNATIONAL, INC.; and DOES
1-10, inclusive,

Defendants.

Civil Action No.: 3:21-cv-01209-E

PLAINTIFF'S ANSWER TO COUNTERCLAIM OF DEFENDANT

TRENDS SNJ, INC.

Plaintiff Deckers Outdoor Corporation (“Deckers” or “Plaintiff”) hereby provides its Answer to the Counterclaim of Defendant Trends SNJ, Inc. (“Trends SNJ” or “Defendant”) and states as follows:¹

COUNTERCLAIMS

104. Deckers does not believe that a response is required to Paragraph 104 of Trends SNJ’s Counterclaim.

COUNT I

(Declaration of Non-Infringement of Trade Dress)

105. Deckers incorporates by reference its Answers to each of the preceding paragraphs of Trends SNJ’s Counterclaim.

106. Deckers admits that an actual and present controversy exists between Trends

¹ This Answer uses the same headings and paragraph numbers as the Counterclaim of Trends SNJ solely for convenience of reference.

SNJ and Deckers with respect to Deckers' claims in its Complaint but denies there exists any basis for such allegations and that Trends SNJ is entitled to any declaratory relief sought.

107. Deckers does not believe that a response is required to Paragraph 102 of Trends SNJ's Counterclaim. To the extent a response is required, Deckers denies the allegations of Paragraph 107.

108. Deckers admits that a similarity exists between SNJ's and Deckers' shoes but denies the remaining allegations of Paragraph 108.

109. Deckers admits that an actual and present controversy exists between Trends SNJ and Deckers with respect to Deckers' claims in its Complaint but denies there exists any basis for such allegations and that Trends SNJ is entitled to any declaratory relief sought.

110. Deckers does not believe that a response is required to Paragraph 110 of Trends SNJ's Counterclaim. To the extent a response is required, Deckers admits it owns a valid trade dress as alleged in the Complaint but denies that Trends SNJ is entitled to any declaratory relief sought.

COUNT II

(Declaration of Invalidity of Trade Dress)

111. Deckers incorporates by reference its Answers to each of the preceding paragraphs of Trends SNJ's Counterclaim.

112. Deckers denies the allegations in Paragraph 112.

113. Deckers denies the allegations in Paragraph 113.

114. Deckers denies the allegations in Paragraph 114.

115. Deckers denies the allegations in Paragraph 115.

116. Deckers does not believe that a response is required to Paragraph 116 of Trends SNJ's Counterclaim. To the extent a response is required, Deckers denies the allegations in Paragraph 116.

117. Deckers admits that an actual and present controversy exists between Trends SNJ and Deckers with respect to Deckers' claims in its Complaint but denies there exists any basis for such allegations and that Trends SNJ is entitled to any declaratory relief sought.

118. Deckers does not believe that a response is required to Paragraph 118 of Trends SNJ's Counterclaim. To the extent a response is required, Deckers admits it owns a valid trade dress as alleged in the Complaint but denies that Trends SNJ is entitled to any declaratory relief sought.

PRAYER FOR RELIEF

Deckers denies that Trends SNJ, Inc. is entitled to any of the relief sought in its prayer for relief.

Dated: March 21, 2022 **BLAKELY LAW GROUP**

By: /s/ Brent H. Blakely

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DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff Deckers Outdoor Corporation hereby demands a trial by jury as to all claims in this litigation.

Dated: March 21, 2022 **BLAKELY LAW GROUP**

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